



STATE OF CONNECTICUT DOCKET FILE COPY ORIGINAL  
DEPARTMENT OF PUBLIC UTILITY CONTROL

June 11, 1999

96-98

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Magalie Roman Salas  
Commission Secretary  
Federal Communications Commission  
Portals II  
445 12<sup>th</sup> Street, S.W.  
Suite TW-A325  
Washington, D.C. 20554

Re: File No. NSD-L-98-136, Petition of the California Public Utilities  
Commission and of the People of the State of California for Delegation of  
Additional Authority

Dear Ms. Salas:

Enclosed please find one original and four copies of the Connecticut Department  
of Public Utility Control comments filed in the above noted proceeding.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

*Louise E. Rickard*

Louise Rickard  
Acting Executive Secretary

Enc.

cc: Al McCloud

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Petition of the California Public Utilities Commission )  
And of the People of the State of California )  
For Delegation of Additional Authority )  
 )  
Implementation of the Local Competition Provisions )  
of the Telecommunications Act of 1996 )

File No.

NSD-L-98-136

CC Docket No.

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COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

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Washington, D.C. 20554

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For Delegation of Additional Authority	)	
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COMMENTS OF THE CONNECTICUT  
DEPARTMENT OF PUBLIC UTILITY CONTROL

**JUN 14 1999**

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I. Introduction

The Connecticut Department of Public Utility Control (CTDPUC) hereby files comments with the Federal Communications Commission (FCC or Commission) in the above noted proceeding in support of the California Public Utilities Commission's (CPUC) Petition for Delegation of Additional Authority pertaining to area code relief and implementation, and to NXX code conservation measures (Petition). Specifically, CPUC requests authority to: (1) order one or more mandatory number pooling trials, which could include 1,000-block pooling and individual telephone number (ITN) pooling; (2) order efficient number use practices within NXX codes, such as threshold fill rates before additional numbering resources could be allocated to a carrier, or sequential number assignment; (3) hear and address requests by individual carriers seeking assignment of NXX codes outside the California monthly lottery process; (4)

order carriers to return to the code administrator unused NXX codes; and (5) order the return of unused or under-utilized portions of NXX codes to the pooling administrator, when one is selected. Petition, pp. 1 and 2.

## II. Discussion

On April 23, 1999, CPUC petitioned the Commission requesting that it be provided the authority to implement various area code conservation measures in the State of California. CPUC states that it is under tremendous pressure to find one or more solutions to the number crisis that it currently faces. CPUC also states that without additional authority from the Commission, it cannot develop a broad slate of solutions to address the problem. Petition, p. 4.

CTDPUC supports the Petition and recommends that it be adopted by the Commission. CPUC has requested Commission authority to implement several area code conservation measures that it believes will address the state's existing number crisis. CPUC in support of its Petition has provided overwhelming evidence demonstrating the need for additional authority to conserve NXX codes. For example, jeopardy situations are declared in area codes within days or weeks after NPA relief implementation has concluded. Petition, p. 6. CTDPUC concurs with CPUC that the FCC has not delegated sufficient authority to the states to effectively address number shortages. Approval of the Petition will provide CPUC with the ability to implement conservation measures and perhaps delay the introduction of new area codes.

CPUC has requested that it be delegated the authority to implement several conservation measures that seek to address the telephone number crisis

in California. The Petition should be approved because CPUC is in a better position to determine what is in the best interest of California. CTDPUC believes that these proposals when collectively implemented, should provide an orderly approach to alleviating the current telephone number crisis in California. CTDPUC notes that a number of CPUC's proposed conservation measures have been adopted and are in use in other jurisdictions. For example, CPUC has requested that the Commission delegate authority to implement mandatory number pooling trials, which could include 1,000-block pooling and individual telephone number (ITN) pooling. Authority to implement mandatory thousand block number pooling has already been delegated to Illinois. The inefficient manner in which telephone numbers are assigned (i.e., in 10,000 blocks), is clearly the underlying factor creating the NPA shortage today. Mandatory thousand block number pooling would provide for a more efficient use of telephone numbers and minimize the wasteful allocation of these limited resources. CPUC should be afforded the same opportunity as was provided in Illinois.

CTDPUC also supports CPUC's request for authority to conduct number pooling trials, specifically, ITN pooling. While providing CPUC with the ability to provide for a more efficient assignment of telephone numbers, such a trial would also provide the Commission and other states with information concerning whether adoption of ITN pooling on a national basis would be beneficial and alleviate the nationwide shortage of numbers. CPUC should be permitted to conduct this trial so that the Commission and other states can make a

determination as to whether it would be appropriate to conduct additional trials of this nature or whether ITN pooling should be adopted on a national basis.

CTDPUC similarly supports CPUC's request for authority to order efficient number use practices within NXX codes, such as fill rates and sequential numbering. Moreover, CTDPUC supports CPUC's request for the ability to order carriers to return unused NXX codes. Given the need for numbers and surplus of previously assigned numbers, a requirement that carriers maximize fill rates before seeking additional NXXs and that they be required to return any unused or under-utilized blocks of numbers in NXX codes should also be adopted as a means of slowing down the unnecessary assignment of numbers. These measures alone should minimize the occurrence of code holders possessing excess number reserves. CPUC has in the opinion of CTDPUC, presented a logical and solid reasoning supporting these measures and therefore, they should be approved.

### III. Conclusion

CPUC has offered the Commission various area code conservation measures, that if adopted as proposed, would provide CPUC with the ability to slow the deployment of additional area codes and minimize the inconvenience, disruption and cost that is often associated with their implementation. Approval of the Petition will also provide CPUC with the flexibility to implement a number of conservation measures and provide it with the ability to impose stricter requirements on those seeking codes and require a more efficient use of the

codes in their possession before additional ones are awarded. The Petition is in the public interest and should be adopted.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF PUBLIC  
UTILITY CONTROL

Donald W. Downes  
Chairman

Glenn Arthur  
Vice-Chairman

Jack R. Goldberg  
Commissioner

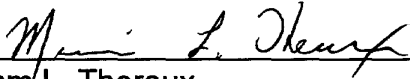
John W. Betkoski, III  
Commissioner

Linda Kelly Arnold  
Commissioner

June 11, 1999

Connecticut Department of  
Public Utility Control  
Ten Franklin Square  
New Britain, CT 06051

**CERTIFICATION**

  
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Miriam L. Theroux  
Commissioner of the Superior Court